

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

MARK A. FAVORS, et al.,

Plaintiffs,

- against -

ANDREW M. CUOMO, et al.,

Defendants.

**ANSWER OF DEFENDANTS
ANDREW M. CUOMO AND
ROBERT J. DUFFY**

11-CV-5632 (DLI-GEL-RR) (RLM)

Defendants ANDREW M. CUOMO and ROBERT J. DUFFY, by and through their attorney the Attorney General, submit this Answer to the Complaint of Plaintiffs Mark A. Favors, Howard Leib, Lillie H. Galan, Edward A. Mulraine, Warren Schreiber, and Weyman A. Carey:

INTRODUCTION

1. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 1 of the Complaint.

2. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 2 of the Complaint except admit that no system of independent redistricting has been adopted in New York State.

3. Defendants Cuomo and Duffy deny that they have stalled or done anything to delay the redistricting process. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the remaining allegations in paragraph 3 of the Complaint.

4. Defendant Cuomo admits that he has made public statements promising to veto a redistricting plan that is not acceptable to him. To the extent that this allegation may imply that Defendant Cuomo has made statements other than those he has made, the allegation is denied. Defendant Cuomo denies knowledge or information sufficient to form a belief regarding the truth or

falsity of the remaining allegations in paragraph 4 of the Complaint. Defendant Duffy denies knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 4 of the Complaint.

5. None of the statements in paragraph 5 constitute factual allegations to which any responsive pleading is required. To the extent that any such statements may be construed as factual allegations, Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to their truth or falsity.

6. The allegations regarding the requirements of the prisoner reallocation law constitute legal conclusions to which no responsive pleading is required. Defendants Cuomo and Duffy deny that they have in any way violated the prisoner reallocation law or that they will do so in the future. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the remaining allegations in paragraph 6 of the Complaint.

7. Defendants Cuomo and Duffy admit the allegations in paragraph 7 of the Complaint.

8. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 8 of the Complaint.

9. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 9 of the Complaint.

10. All of the allegations in paragraph 10 constitute legal conclusions to which no responsive pleading is required. To the extent that any of the statements in paragraph 10 may constitute factual allegations, Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to their truth or falsity.

11. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 11 of the Complaint.

12. None of the statements in paragraph 12 constitute factual allegations to which any responsive pleading is required. To the extent that any such statements may be construed as factual allegations, Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to their truth or falsity.

13. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 13 of the Complaint.

PARTIES

14. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 14 of the Complaint.

15. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 15 of the Complaint.

16. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 16 of the Complaint.

17. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 17 of the Complaint.

18. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 18 of the Complaint.

19. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 19 of the Complaint.

20. Defendants Cuomo and Duffy admit the allegations in paragraph 20 of the Complaint.

21. Defendants Cuomo and Duffy admit the allegations in paragraph 21 of the Complaint but note that Attorney General Eric T. Schneiderman has been voluntarily dismissed as a defendant in this action.

22. Defendants Cuomo and Duffy admit the allegations in paragraph 22 of the Complaint.

23. Defendants Cuomo and Duffy admit the allegations in paragraph 23 of the Complaint.

24. Defendants Cuomo and Duffy admit the allegations in paragraph 24 of the Complaint.

25. Defendants Cuomo and Duffy admit the allegations in paragraph 25 of the Complaint.

26. Defendants Cuomo and Duffy admit the allegations in paragraph 26 of the Complaint.

27. Defendants Cuomo and Duffy admit the allegations in paragraph 27 of the Complaint.

28. Defendants Cuomo and Duffy admit the allegations in paragraph 28 of the Complaint.

JURISDICTION AND VENUE

29. All of the statements in paragraph 29 constitute legal conclusions to which no responsive pleading is required.

30. All of the statements in paragraph 30 constitute legal conclusions to which no responsive pleading is required.

31. All of the statements in paragraph 31 constitute legal conclusions to which no responsive pleading is required.

32. All of the statements in paragraph 32 constitute legal conclusions to which no responsive pleading is required.

33. All of the statements in paragraph 33 constitute legal conclusions to which no responsive pleading is required.

34. All of the statements in paragraph 34 constitute legal conclusions to which no responsive pleading is required.

FACTUAL ALLEGATIONS

35. All of the statements in paragraph 35 constitute legal conclusions to which no responsive pleading is required.

36. All of the statements in paragraph 36 constitute legal conclusions to which no responsive pleading is required.

37. Defendants Cuomo and Duffy deny the allegations in paragraph 37 of the Complaint except admit that the process of re-drawing district lines is known as redistricting and that in New York State, the Legislature has responsibility, albeit not exclusive responsibility, with respect to redistricting.

38. Defendants Cuomo and Duffy admit the allegations in paragraph 38 of the Complaint.

39. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 39 of the Complaint except admit that LATFOR has the role of aiding the Legislature in its task with respect to redistricting.

40. Defendants Cuomo and Duffy admit the allegations in paragraph 40 of the Complaint.

41. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 41 of the Complaint.

42. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 42 of the Complaint.

43. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 43 of the Complaint.

44. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 44 of the Complaint.

45. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 45 of the Complaint.

46. All of the statements in paragraph 46 constitute legal conclusions to which no responsive pleading is required.

47. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 47 of the Complaint.

48. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 48 of the Complaint.

49. The allegation in paragraph 49 that “[t]he United States Supreme Court has held that a state’s House of Representatives districts must be as equal to one another as practicable but that state legislative districts under certain circumstances may vary as much as ten percent between the most and least populous districts” constitutes legal conclusions to which no responsive pleading is required. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the remaining allegations in paragraph 49 of the Complaint.

50. All of the statements in paragraph 50 constitute legal conclusions to which no responsive pleading is required.

51. All of the statements in paragraph 51 constitute legal conclusions to which no responsive pleading is required.

52. All of the statements in paragraph 52 constitute legal conclusions to which no responsive pleading is required.

53. All of the statements in paragraph 53 constitute legal conclusions to which no responsive pleading is required.

54. All of the statements in paragraph 54 constitute legal conclusions to which no responsive pleading is required.

55. All of the statements in paragraph 55 constitute legal conclusions to which no responsive pleading is required.

56. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 56 of the Complaint.

57. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 57 of the Complaint.

58. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 58 of the Complaint except admit that no independent redistricting process has been enacted by the Legislature.

59. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 59 of the Complaint.

60. All of the statements in paragraph 60 of the Complaint constitute legal conclusions to which no responsive pleading is required.

61. All of the statements in paragraph 61 of the Complaint constitute legal conclusions to which no responsive pleading is required.

62. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 62 of the Complaint except state

that the statements regarding alleged violations of law constitute legal conclusions to which no responsive pleading is required. Defendants Cuomo and Duffy deny that they have violated any law.

63. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 63 of the Complaint.

64. All of the statements in paragraph 64 of the Complaint constitute legal conclusions to which no responsive pleading is required.

65. Defendants Cuomo and Duffy admit the allegations in paragraph 65 of the Complaint.

66. All of the statements in paragraph 66 of the Complaint constitute legal conclusions to which no responsive pleading is required.

67. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 67 of the Complaint except state that the statements regarding alleged violations of law constitute legal conclusions to which no responsive pleading is required. Defendants Cuomo and Duffy deny that they have violated any law.

68. Defendants Cuomo and Duffy admit the allegations in paragraph 68 of the Complaint.

69. Defendant Cuomo admits the allegations in paragraph 69 of the Complaint. Defendant Duffy denies knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 69.

70. Defendants Cuomo and Duffy admit the allegations in paragraph 70 of the Complaint.

71. Defendants Cuomo and Duffy admit the allegations in paragraph 71 of the Complaint.

72. Defendants Cuomo and Duffy admit the allegations in paragraph 72 of the Complaint.

73. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 73 of the Complaint.

74. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 74 of the Complaint.

75. Defendants Cuomo and Duffy admit the allegations in paragraph 75 of the Complaint.

76. Defendant Cuomo denies the allegations in paragraph 76 to the extent that his statements are characterized in the allegations. Defendant Cuomo denies knowledge or information sufficient to form a belief regarding the truth or falsity of the remaining allegations in paragraph 76 of the Complaint. Defendant Duffy denies knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 76 of the Complaint.

77. All of the statements in paragraph 77 of the Complaint constitute legal conclusions to which no responsive pleading is required except Defendants Cuomo and Duffy admit that the United States Department of Defense denied the request of New York State to keep its 2012 primary in September.

78. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 78 of the Complaint.

79. All of the statements in paragraph 79 of the Complaint constitute legal conclusions to which no responsive pleading is required.

80. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 80 of the Complaint.

81. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 81 of the Complaint.

82. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 82 of the Complaint.

83. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 83 of the Complaint.

84. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 84 of the Complaint except admit that the Legislature was in recess at the time the Complaint was filed.

85. All of the statements in paragraph 85 of the Complaint constitute legal conclusions to which no responsive pleading is required except that Defendants Cuomo and Duffy admit that in 2010, New York enacted the prisoner reallocation law.

86. All of the statements in paragraph 86 of the Complaint constitute legal conclusions to which no responsive pleading is required.

87. All of the statements in paragraph 87 of the Complaint constitute legal conclusions to which no responsive pleading is required.

88. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 88 of the Complaint.

89. All of the allegations in paragraph 89 constitute legal conclusions to which no responsive pleading is required. To the extent the allegations in paragraph 89 may constitute factual allegations, Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to their truth or falsity.

90. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 90.

91. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 91 of the Complaint.

92. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 92 of the Complaint except admit that there is a lawsuit challenging the constitutionality of the prisoner reallocation law and that no stay is in effect.

93. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 93 of the Complaint.

94. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 94 of the Complaint.

95. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 95 of the Complaint.

96. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 96 of the Complaint.

97. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 97 of the Complaint.

98. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 98 of the Complaint.

99. Defendants Cuomo and Duffy admit the allegations in paragraph 99 of the Complaint.

100. All of the statements in paragraph 100 constitute legal conclusions to which no responsive pleading is required.

101. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 101 of the Complaint except note that

the requirements of the Voting Rights Act are a matter of law to which no responsive pleading is required.

102. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 102 of the Complaint except note that the requirements of the prisoner reallocation law are a matter of law to which no responsive pleading is required.

103. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 103 of the Complaint.

104. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 104 of the Complaint.

105. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph 105 of the Complaint.

COUNT I

106. Defendants Cuomo and Duffy repeat their responses to paragraphs 1 through 105.

107. All of the statements in paragraph 107 constitute legal conclusions to which no responsive pleading is required except that New York's districts were last adjusted in 2002, which Defendants Cuomo and Duffy admit.

108. All of the statements in paragraph 108 constitute legal conclusions to which no responsive pleading is required.

109. All of the statements in paragraph 109 constitute legal conclusions to which no responsive pleading is required.

110. All of the statements in paragraph 110 constitute legal conclusions to which no responsive pleading is required except the allegation that LATFOR has not complied with the prisoner reallocation law, an allegation which Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to its truth or falsity.

111. The requirements that LATFOR must follow are matters of law to which no responsive pleading is required. To the extent that paragraph 111 of the Complaint makes factual allegations, Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to their truth or falsity.

112. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 112 of the Complaint.

113. All of the statements in paragraph 113 of the Complaint constitute legal conclusions to which no responsive pleading is required.

114. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 114 of the Complaint.

115. All of the statements in paragraph 115 of the Complaint constitute legal conclusions to which no responsive pleading is required.

116. All of the statements in paragraph 116 of the Complaint constitute legal conclusions to which no responsive pleading is required.

117. All of the statements in paragraph 117 of the Complaint constitute legal conclusions to which no responsive pleading is required.

118. All of the statements in paragraph 118 of the Complaint constitute legal conclusions to which no responsive pleading is required.

COUNT II

119. Defendants Cuomo and Duffy repeat their responses to paragraphs 1 through 118.

120. All of the statements in paragraph 120 of the Complaint constitute legal conclusions to which no responsive pleading is required.

121. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 121 of the Complaint.

122. All of the statements in paragraph 122 of the Complaint constitute legal conclusions to which no responsive pleading is required. To the extent that paragraph 122 alleges violations of law by Defendants Cuomo or Duffy, they are denied.

123. All of the statements in paragraph 123 of the Complaint constitute legal conclusions to which no responsive pleading is required.

124. All of the statements in paragraph 124 of the Complaint constitute legal conclusions to which no responsive pleading is required.

125. All of the statements in paragraph 125 of the Complaint constitute legal conclusions to which no responsive pleading is required.

126. All of the statements in paragraph 126 of the Complaint constitute legal conclusions to which no responsive pleading is required.

COUNT III

127. Defendants Cuomo and Duffy repeat their responses to paragraphs 1 through 126.

128. All of the statements in paragraph 128 of the Complaint constitute legal conclusions to which no responsive pleading is required.

129. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief regarding the truth or falsity of the allegations in paragraph 129 of the Complaint.

130. All of the statements in paragraph 130 of the Complaint constitute legal conclusions to which no responsive pleading is required.

131. All of the statements in paragraph 131 of the Complaint constitute legal conclusions to which no responsive pleading is required.

132. All of the statements in paragraph 132 of the Complaint constitute legal conclusions to which no responsive pleading is required.

133. All of the statements in paragraph 133 of the Complaint constitute legal conclusions to which no responsive pleading is required.

134. All of the statements in paragraph 134 of the Complaint constitute legal conclusions to which no responsive pleading is required.

COUNT IV

135. Defendants Cuomo and Duffy repeat their responses to paragraphs 1 through 134.

136. All of the statements in paragraph 136 of the Complaint constitute legal conclusions to which no responsive pleading is required.

137. All of the statements in paragraph 137 of the Complaint constitute legal conclusions to which no responsive pleading is required.

138. All of the statements in paragraph 138 of the Complaint constitute legal conclusions to which no responsive pleading is required.

139. All of the statements in paragraph 139 of the Complaint constitute legal conclusions to which no responsive pleading is required.

140. All of the statements in paragraph 140 of the Complaint constitute legal conclusions to which no responsive pleading is required.

141. All of the statements in paragraph 141 of the Complaint constitute legal conclusions to which no responsive pleading is required.

142. All of the statements in paragraph 142 of the Complaint constitute legal conclusions to which no responsive pleading is required.

COUNT V

143. Defendants Cuomo and Duffy repeat their responses to paragraphs 1 through 142.

144. All of the allegations in paragraph 144 of the Complaint concern Plaintiff's Count V of the Complaint, which Plaintiffs have withdrawn.

145. All of the allegations in paragraph 145 of the Complaint concern Plaintiff's Count V of the Complaint, which Plaintiffs have withdrawn.

146. All of the allegations in paragraph 146 of the Complaint concern Plaintiff's Count V of the Complaint, which Plaintiffs have withdrawn.

147. All of the allegations in paragraph 147 of the Complaint concern Plaintiff's Count V of the Complaint, which Plaintiffs have withdrawn.

148. All of the allegations in paragraph 148 of the Complaint concern Plaintiff's Count V of the Complaint, which Plaintiffs have withdrawn.

149. All of the allegations in paragraph 149 of the Complaint concern Plaintiff's Count V of the Complaint, which Plaintiffs have withdrawn.

COUNT VI

150. Defendants Cuomo and Duffy repeat their responses to paragraphs 1 through 149.

151. All of the allegations in paragraph 151 of the Complaint concern Plaintiff's Count VI of the Complaint, which Plaintiffs have withdrawn.

152. All of the allegations in paragraph 152 of the Complaint concern Plaintiff's Count VI of the Complaint, which Plaintiffs have withdrawn.

153. All of the allegations in paragraph 153 of the Complaint concern Plaintiff's Count VI of the Complaint, which Plaintiffs have withdrawn.

154. All of the allegations in paragraph 154 of the Complaint concern Plaintiff's Count VI of the Complaint, which Plaintiffs have withdrawn.

155. All of the allegations in paragraph 155 of the Complaint concern Plaintiff's Count VI of the Complaint, which Plaintiffs have withdrawn.

COUNT VII

156. Defendants Cuomo and Duffy repeat their responses to paragraphs 1 through 155.

157. Defendants Cuomo and Duffy deny the allegations in paragraph 157 of the Complaint to the extent that they allege any violations of law by Defendant Cuomo or Defendant Duffy. Defendants Cuomo and Duffy deny knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations in paragraph 157 of the Complaint.

158. All of the statements in paragraph 158 of the Complaint constitute legal conclusions, to which no responsive pleading is required.

AND AS FOR A FIRST AFFIRMATIVE DEFENSE

The Complaint fails to state a cause of action against Defendants Cuomo and Duffy.

AND AS FOR A SECOND AFFIRMATIVE DEFENSE

Defendants Cuomo and Duffy have had no personal involvement in any alleged violations of law.

AND AS FOR A THIRD AFFIRMATIVE DEFENSE

Plaintiffs lack standing to assert causes of action with respect to districts in which they do not reside.

AND AS FOR A FOURTH AFFIRMATIVE DEFENSE

The Court must defer to the sovereign State of New York, including its judicial branch, with respect to redistricting claims.

WHEREFORE, Defendants Cuomo and Duffy request that this Court not issue any orders against Defendant Cuomo or Defendant Duffy.

Dated: New York, New York
March 7, 2012

Respectfully submitted,

ERIC T. SCHNEIDERMAN
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*Attorney for Defendants Andrew M. Cuomo and
Robert J. Duffy*

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